

Modern Slavery Policy

Status	Final
Version	1.0
Policy Owner	Chief Executive Officer
Policy Approver	PGW Board of Directors
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Modern Slavery Policy

Purpose

PGG Wrightson Limited (PGW) is committed to acting ethically and with integrity in all business dealings and relationships. PGW is opposed to all forms of Modern Slavery and recognises our responsibility to respect human rights. PGW is committed to ensuring that Modern Slavery has no place within our operations or supply chains. This policy reflects our commitment to implementing and enforcing effective systems and controls to safeguard against any form of Modern Slavery occurring within our business and supply chains.



Modern Slavery refers to severe forms of exploitation where a person cannot refuse or leave work due to coercion, threats, deception, or abuse of vulnerability, including slavery, sexual exploitation, servitude, forced or exploitative labour, debt-bondage or serfdom, trafficking in persons and the worst forms of child labour.

Key points

PGW has a zero-tolerance approach to modern slavery in our operations and supply chains. PGW does not tolerate practices that cause, contribute to, or perpetuate modern slavery, nor do we tolerate failure to address identified risks or harms.

Where modern slavery risks or impacts are identified, PGW is committed to acting swiftly and transparently, prioritising meaningful remediation and working collaboratively with suppliers who demonstrate a genuine commitment to addressing issues. Where remediation is not achievable, progress is insufficient, or suppliers are unwilling to engage, PGW may take decisive action, including phasing out supplier relationships or changing sourcing strategies.

Scope

This policy applies to all PGW Group businesses and PGW Team members.

PGW Team members includes permanent and fixed term employees, temporary and casual workers, independent contractors (including Real Estate and Livestock agents), and any third-party contractors (including consultants). PGW Group businesses include: PGG Wrightson Ltd, business units, its subsidiaries, associated companies over which PGW has significant influence and joint ventures.

Policy Detail

PGW commits to:

- Maintaining a zero-tolerance approach to Modern Slavery in all its forms.
- Conducting due diligence on its material suppliers to assess Modern Slavery risks.
- Developing training and awareness education of Modern Slavery for relevant PGW personnel.
- Establishing clear reporting mechanisms and investigate all credible allegations of Modern Slavery.
- Working collaboratively with suppliers who demonstrate genuine commitment to remediation.
- Taking decisive action, including termination of business relationships where Modern Slavery is identified and not remediated appropriately.
- Reporting transparently on efforts.

Internal Accountability

- The PGW Board of Directors has overall governance responsibility for Modern Slavery compliance.
- The Chief Executive Officer is accountable for Policy implementation.
- The Category Management and Procurement Teams integrate Policy requirements into supplier agreements and contract management.

Performance Indicators

PGW tracks and reports on:

- Percentage of supplier spend assessed for Modern Slavery risk.
- Number of non-compliances identified and remediated.
- Supplier contract terminations due to Modern Slavery concerns.
- Training completion rates.
- The number of grievance reports received and resolved.

About this policy

Breaches

Any breaches of this policy must be reported to the Policy Owner. Breaches of this Policy include (but are not limited to):

- Non-compliance of a supplier in relation to Modern Slavery.
- Repeated failure of a relevant PGW staff member to complete mandatory Modern Slavery training.

Any breach of this policy will be considered on a case-by-case basis. Disregard for, or failure to comply with, this policy may result in disciplinary action, up to and including dismissal, for employees.

Clarification and Exceptions

If you require clarification about any aspect of this policy, please contact the Policy Owner. Exceptions to this policy can only be approved by the Policy Owner or Policy Approver.

Compliance

Compliance of this policy will be monitored by the Executive Leadership Team, with responsibility sitting with the relevant Executive Leadership Team Member for each business unit, who will report breaches of the policy to the Policy Owner, including any material issues that arise.

Legislation/Bills

The following is a list of New Zealand legislation that is relevant for this policy:

- Modern Slavery Reporting Bill 2026 (Member's Bill)
- Crimes Act 1961 (Sections 98, 98AA, 98D and 207A covering slavery, human trafficking and forced marriage)
- Immigration Act 2009 (Section 351 covering migrant exploitation)

Related policies and documents

The following is a list of documents that support this policy, including standards, processes, procedures, guidelines, templates.

Sustainability Policy	The Sustainability Policy references PGW's commitment to a ' <i>zero-tolerance of Modern Slavery in all its forms - Assessing and addressing the risks of modern slavery in operations and supply chains through due diligence and remediation processes.</i> '
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Review

This Policy is to be reviewed in 1 year. Minor changes to this policy can be approved at any time by the Policy Owner.